

3.0 BENEFITS, COSTS, AND RISKS

Impacts of Movement to New COD Process: Schools

*All comparisons are from the current process to the end state of the common process (100% of schools using the common process).

Note that both processes will be in place during transition

	Benefits	Current Processes	Common Process
1	Better access to data		
	•Increased access to SFA database/ services		X
	•Access to data through single portal		X
	•Ability to download data for institution research		X
	•Access to real-time data, from best available sources		X
	•Increased capacity to manage default rate		X
2	Reduction in errors due to real-time Web-based edits		X
3	Flexibility to send records via batch or real-time (initial, confirmation, changes)		X
4	Real-time acknowledgements		X
5	Real-time exception processing		X
6	Flexibility to send one record per student/ disbursement		X
7	No changes required to business processes to support	X	
8	Reduced processing costs (one process, single layout, same definitions, etc)		X
9	Faster access to cash in bank		X
10	Provision for emergency advanced funding	X	X
11	Increased data integrity (due to real-time and best source)		X
12	Increased fiscal integrity		X
13	Less person time managing systems		X
	Reduction in after-the-fact downward adjustments due to improper reporting and reconciliation		X
15	Ability to draw down less than the approved amount of funds (in order to minimize the potential for excess cash)	X	X



Impacts of Movement to New COD Process: Schools (cont.)

		Current	Common
Costs		Processes	Process
1 Sustain three sep reconciliation	parate processes for reporting and	X	
2 Lengthy reconci	liation	X	
3 Annual updates		X	X
4 Development of	major systems changes		X
5 Cost of training	staff on new process		X



Impacts of Movement to New COD Process: Schools (cont.)

Risks	Current Processes	Common Process	Potential	Risk Analysis Impact	Ability to Control
Removing the ability for schools to access funds via advanced funding lessens their flexibility		X	High	Medium	Low/High*
2 Inability to adjust business processes to support common process and just-in-time					
Inability to efficiently move to upfront reporting may impact cash flow		X	Medium	Medium	Low/High*
Inability to efficiently move to upfront reporting/ change other key business processes may impact ability to get funds to students and, therefore, effect enrollment and retention		X	Low	Medium	Low/High*
• No access to funds – have to front own funds/can't afford to pay student		X	Medium	High	Low
3 Data integrity issues related to any possible conversion		X	Low	High	High
4 Software vendor is unable to modify system to support process		X	Medium	High	Medium
5 If the problems cannot be solved quickly and explained sufficiently, students may call or have parents call to resolve problems, therein flooding the financial aid offices with more calls.		X	Low	Medium	High

^{*}ability to alleviate potential is low, but ability to mitigate impact is high.



Impacts of Movement to New COD Process: Department of Education

*All comparisons are from the current process to the end state of the common process (100% of schools using the common process).

Note that both processes will be in place during transition

	Benefits	Current Processes	Common Process
1	Schools will have less trouble reconciling program funds. This means CSR's and Title IV Ops accountants can resolve issues more efficiently because they won't have to go over the same ground with the schools as many times.		X
2	Case management people will not have to focus on systems issues as much and will be able to focus on more important compliance issues.		X
3	A common system will mean employees spend less time learning about systems or getting access to them, and more time focusing on the information the systems contain.		X
4	A common layout means easier access to more data, both at the student level and the school level, for CAM's and case management people.		X
5	SFA/CFO will be able to make better reports to Congress and better responses to OIG (because a common, simpler reconciliation process will mean that the funds given to schools will be more timely accounted for)		X

Costs

1	Redesigning two systems that are less than five years old – unrealized benefits of new system	X
2	System modifications	X
3	Additional staff	X
4	Contract impacts	X
5	Training	X
6	Development	X



Impacts of Movement to New COD Process: Department of Education (cont.)

	Risks	Current Processes	Common Process	Potential	Risk Analysis Impact	Ability to Control
1	Failure to properly communicate roles to staff and provide support could hinder the implementation					
	•Insufficient communication of objectives		X	Low	High	High
	•Failure to involve all staff/appropriate staff		X	Low	High	High
	•Not enough additional resources brought on board to successfully implement while maintaining current processes		X	Medium	High	High
2	Failure to fully define and communicate comprehensive transition and implementation plan		X	Low	High	High
3	Community backlash related to second major change in five years		X	Medium	High	Medium
4	Inability to make required changes to statutes, if applicable		X	Medium	High	Low
5	Inability to properly manage 'bumps' during Year One can impact credibility and full implementation		X	Medium	High	High
6	School submits records for all potential recipients because it is not sure which students will enroll. If a record is submitted and the student does not enroll, the school has received funds in excess of true need.		X	Unknown	Medium	Medium
7	Data integrity issues related to any required conversion		X	Medium	High	High
8	Inability to properly maintain operations in emergency situations		X	Low	High	High

Impacts of Movement to New COD Process: Students

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Note that both processes will be in place during transition

		Current	Common
	Benefits	Processes	Process
1	Potential for real time exception processing - would enable exception students to get money faster		X
2	Improved access to data		
	Students will be able to check account history online and only have to check one place to receive all information		X
	Access to timely/accurate data		X
	Better capacity to manage debt		X
3	With improved edits and reduced internal checking within ED systems, fewer students put on "hold" for resolution		X
4	Students receive better customer service - with staff having to master only one system, their energies can be more focused on customer service		X

Costs

1 Possible "glitches" during transition to COD may disrupt	X
flow of funds to students	



Impacts of Movement to New COD Process: Students (cont.)

				Risk Analysis	
Risks	Current Processes	Common Process	Potential	Impact	Ability to Control
		1		Impact	ı
1 Not getting funded if school cannot submit records prior to disbursement	X	X	High	High	High
2 If a school phases in before they are truly ready, there may be more mistakes and the students could see a delay in getting their money.		X	High	High	Medium
3 If a school is ill-prepared for problems that arise, customer service may fall short in many areas. The school may not be able to handle calls in a timely fashion, therefore leaving the student without an answer or the school may not be able to fully explain the problem, leaving the student's problem unresolvable at that time.		X	Medium	Medium	High
4 Increased potential for loan and additional interest if school doesn't report changes in a timely fashion		X	Medium	High	Medium
5 Data integrity issues related to any required conversion		X	Medium	High	High

Impacts of Movement to New COD Process: Taxpayers

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Note that both processes will be in place during transition

	Benefits	Current Processes	Common Process
1	Consistent support of Title IV program support by ED (all treated and reconciled/the same schools deal with the systems at the same)		X
2	Better fiduciary management and fiscal control		X
3	Provides evidence that PBO can address Congress' charge to integrate legacy systems		X
4	Better access to data at ED provides better information to Congress and other cognizant bodies		X
5	Makes fraud more difficult. Under routine circumstances, schools will not be able to draw funds up to an initial authorization without providing supporting documentation		X

Costs

1 Opportunity costs and lost interest on funds tied up at	X	
schools until final reconciliation/ downward adjustments		



Impacts of Movement to New COD Process: Taxpayers (cont.)

				Risk Analysis	
	Current	Common			Ability to
Risks	Processes	Process	Potential	Impact	Control
1 Implementation risks common to students, schools, and ED		X	High	High	High
2 Enormous cost of failure		X	Medium	High	High
3 Lack of fiscal control brings continuation of programs into question	X				
4 Fragmented information makes identification of high-risk institutions and, therefore, protection of student interests, difficult	X				